

JEFFREY S. CHIESA

Attorney General of New Jersey
Attorney for Petitioner
State of New Jersey
Department of Law and Public Safety
Division of Gaming Enforcement
1300 Atlantic Avenue
Atlantic City, New Jersey 08401

By: Brian C. Bisciegli
Deputy Attorney General
(609) 317-6218

STATE OF NEW JERSEY
OFFICE OF THE ATTORNEY GENERAL
DIVISION OF GAMING ENFORCEMENT
DOCKET NO. *12-0378-EL*

STATE OF NEW JERSEY, DEPARTMENT
OF LAW AND PUBLIC SAFETY,
DIVISION OF GAMING ENFORCEMENT,

Petitioner,

v.

TARA L. CLARK,

Respondent.

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Civil Action

PETITION FOR
PLACEMENT ON
EXCLUSION LIST

Petitioner, State of New Jersey, Department of Law and Public Safety,
Division of Gaming Enforcement ("Division"), located at 1300 Atlantic Avenue, Atlantic City,
New Jersey, 08401 says:

1. Respondent, TARA L. CLARK ("Clark"), is a resident of New Jersey,
having an address of [REDACTED]

2. N.J.A.C. 13:69G-1.3(a)3 provides, in pertinent, part for the exclusion

of:

any person who has been convicted of a criminal offense.... punishable by more than six months in prison and whose presence in a licensed casino establishment would be inimical to the interests of the State of New Jersey and of license gaming therein.

3. N.J.A.C. 13:69G-1.3(a)4 authorizes the exclusion of

any person whose presence in a licensed casino establishment would be inimical to the interest of the State of New Jersey or licensed gaming therein, including

iii Persons who pose a threat to the safety of the patrons or employee sof a casino licensee

iv. Persons with a documented history of conduct involving the undue disruption of the gaming operations of casino licensees

4. On August 24, 2011, Clark was charged in Atlantic County Indictment No. 11-08-2047-DCP with Robbery, second degree, contrary to N.J.S.A. 2C:15-1. See Exhibit "A", attached. Clark and an accomplice allegedly threatened a patron of Harrah's Atlantic City with violence in the course of stealing her pocketbook. On January 6, 2012, upon her plea, Clark was convicted of the amended offense of Theft from the Person, third degree, contrary to N.J.S.A. 2C:20-2b(2)(d) and sentenced to a 2 year probation term, and, further, required to pay certain fines an fees. Clark was also ordered to stay out of Atlantic

City casinos during her probation term. See Exhibit "B", attached.

5. Based on information contained in Paragraphs 1 through 4 of this petition, Clark is a person who has been convicted of a criminal offense punishable by more than six months in prison and whose presence in a licensed casino establishment would be inimical to the interests of the State of New Jersey and of license gaming therein and should be excluded from casino premises pursuant to N.J.A.C. 13:69G-1.3(a)3.

6. Based on information contained in Paragraphs 1 through 4 of this petition, Clark is a person whose presence in a licensed casino establishment would be inimical to the interests of the State of New Jersey or licensed gaming therein and should be excluded from casino premises pursuant to N.J.A.C. 13:69G-1.3(a)4.

WHEREFORE, Petitioner demands the following relief against Respondent, Tara L. Clark:

A. Judgment that the Respondent, Tara L. Clark, is a person who has been convicted of an offense punishable by more than 6 months in jail and whose presence in a licensed casino establishment would be inimical to the interest of the State of New Jersey or of licensed gaming therein, within the meaning of N.J.A.C. 13:69G-1.3(a)3;

B. Judgment that the Respondent, Tara L. Clark, is a person whose

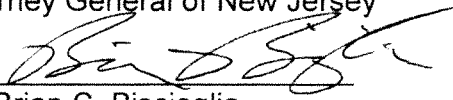
presence in a licensed casino establishment would be inimical to the interest of the State of New Jersey or of licensed gaming therein, within the meaning of N.J.A.C.13:69G-1.3(a)4;

C. Judgment entering a Final Order placing Respondent, Tara L. Clark, on the exclusion list pursuant to N.J.S.A. 5:12-71(l) and N.J.A.C.13:69G-1.3(a)3 and 13:69G-1.3(a)4; and,

D. Judgment for such other and further relief as the Director may deem just and appropriate under the circumstances.

Respectfully submitted,

JEFFREY S. CHIESA
Attorney General of New Jersey

By: 
Brian C. Bisciegia
Deputy Attorney General

Dated 6/18/12

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION - CRIMINAL
COUNTY OF ATLANTIC

STATE OF NEW JERSEY)

ATLANTIC COUNTY GRAND JURY

v.)

Indictment No. 11-08-2047-DCP

RAYMOND PETERS III ~~EX-2~~)

Pros. No. 11-2494

TARA CLARK ~~EX-1~~)

ORIGINAL

DO NOT

REMOVE

FROM FILE

The Grand Jurors of the County of Atlantic, for the State of New Jersey, upon their oaths
present that:

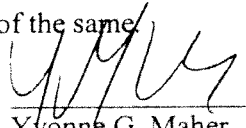
COUNT ONE

(Robbery - Second Degree)


RAYMOND PETERS III

TARA CLARK

on or about June 11, 2011, at the City of Atlantic City, in the County of Atlantic, and within
the jurisdiction of this Court, at Harrah's Hotel & Casino, while in the course of committing a
theft, knowingly did use force upon ~~JB~~ and threaten her with and purposely put her in fear of
immediate bodily injury, contrary to the provisions of N.J.S.A. 2C:15-1, N.J.S.A. 2C:2-6, and
against the peace of this State, the government and dignity of the same.


Yvonne G. Maher
Deputy Attorney General
Casino Prosecutions Bureau
Division of Criminal Justice

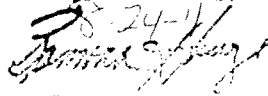
A TRUE BILL:


Foreperson

AUG 24 2011

Date

REC'D & FILED
SUPERIOR COURT
NEW JERSEY

8-24-11

RECEIVED



4



Judgment of Conviction

Superior Court of New Jersey, ATLANTIC County

State of New Jersey

v.

Last Name

CLARK

First Name

TARA

Middle Name

L

Also Known As

ORIGINAL

Date of Birth

09/22/1989

SBI Number

[REDACTED]

Date(s) of Offense

06/11/2011

Date of Arrest

06/15/2011

PROMIS Number

[REDACTED]

Date Ind / Acc / Complt Filed

08/24/2011

Original Plea

☒ Not Guilty

☐ Guilty

Date of Original Plea

09/27/2011

Adjudication By

☒ Guilty Plea

☐ Jury Trial Verdict

☐ Non-Jury Trial Verdict

☐ Dismissed / Acquitted

Date: 12/06/2011

Original Charges

Ind / Acc / Complt	Count	Description	Statute	Degree
11-08-02047-I	1	ROBBERY	2C:15-1	2

Final Charges

Ind / Acc / Complt	Count	Description	Statute	Degree
11-08-02047-I	AMENDED 1	THEFT FROM THE PERSON	2C:20-2B(2)(D)	3

Sentencing Statement

It is, therefore, on 01/06/2012 **ORDERED** and **ADJUDGED** that the defendant is sentenced as follows:

CT. 1 AS AMENDED: PROBATION 2 YEARS
RESTITUTION \$435.00, JOINTLY AND SEVERALLY, ALL MONIES PAYABLE THRU PROBATION,
NO CONTACT WITH VICTIM, FULL TIME EMPLOYMENT WITHIN 90 DAYS, RANDOM URINE
SCREENS, STAY OUT OF ATLANTIC CITY CASINOS DURING PERIOD OF PROBATION, PAY RESTITUTION
AT \$100.00 PER MONTH STARTING 3-1-12, REMAINING COUNTS, CHARGES, AND D.P.'S DISMISSED.

☐ It is further ORDERED that the sheriff deliver the defendant to the appropriate correctional authority



Total Custodial Term

000 Years 00 Months 000 Days

Institution Name

Total Probation Term

02 Years 00 Months

DEDR (N.J.S.A. 2C:35-15 and 2C:35-5.11)

A mandatory Drug Enforcement and Demand Reduction (DEDR) penalty is imposed for each count. (Write in number of counts for each degree.)

☐ DEDR penalty reduction granted (N.J.S.A. 2C:35-15a(2))

	Standard		Doubled	
1st Degree	@ \$		@ \$	
2nd Degree	@ \$		@ \$	
3rd Degree	@ \$		@ \$	
4th Degree	@ \$		@ \$	
DP or	@ \$		@ \$	
Petty DP	@ \$		@ \$	

Total DEDR Penalty \$

☐ The court further ORDERS that collection of the DEDR penalty be suspended upon defendant's entry into a residential drug program for the term of the program. (N.J.S.A. 2C:35-15e)

Forensic Laboratory Fee (N.J.S.A. 2C:35-20)

Offenses @ \$

Total Lab Fee

\$

VCCA Assessment (N.J.S.A. 2C:43-3.1)

Counts	Number	Amount
1	1 @	\$ 50.00
	@	\$
	@	\$
	@	\$
	@	\$

Total VCCA Assessment \$ 50.00

Vehicle Theft / Unlawful Taking Penalty (N.J.S.A. 2C:20-2.1)

Offense

Mandatory Penalty

\$

Other Fees and Penalties

Law Enforcement Officers Training and Equipment Fund Penalty (N.J.S.A. 2C:43-3.3)

☒ \$ 30.00

Safe Neighborhood Services Fund Assessment (N.J.S.A. 2C:43-3.2)

☒ 1 Offenses @ \$ 75.00

Total: \$ 75.00

Probation Supervision Fee (N.J.S.A. 2C:45-1d)

☒ \$ 15.00

Statewide Sexual Assault Nurse Examiner Program Penalty (N.J.S.A. 2C:43-3.6)

☐ Offenses @ \$

Total \$

Transaction Fee (N.J.S.A. 2C:46-1.1)

☐

Certain Sexual Offenders Surcharge (N.J.S.A. 2C:43-3.7)

☐ \$

Domestic Violence Offender Surcharge (N.J.S.A. 2C:25-29.4)

☐ \$

Sex Crime Victim Treatment Fund Penalty (N.J.S.A. 2C:14-10)

☐ \$

Fine

\$

Restitution

\$ 435.00

Total Financial Obligation

\$ 590.00

Additional Conditions

☒ The defendant is hereby ordered to provide a DNA sample and ordered to pay the costs for testing of the sample provided (N.J.S.A. 53:1-20.20).

☐ The defendant is hereby sentenced to community supervision for life. (If offense occurred before 1/14/04) (N.J.S.A. 2C:43-6.4)

☐ The defendant is hereby sentenced to parole supervision for life. (If offense occurred on or after 1/14/04) (N.J.S.A. 2C:43-6.4).

☐ The defendant is hereby ordered to serve a _____ year term of parole supervision, which term shall begin as soon as defendant completes the sentence of incarceration. (N.J.S.A. 2C:43-7.2).

☐ The court imposes a restraining order pursuant to DORA. (N.J.S.A. 2C:35-5.7(h)). Restraining Order expires _____

Findings Per N.J.S.A. 2C:47-3

☐ The court finds that the defendant's conduct was characterized by a pattern of repetitive and compulsive behavior.

☐ The court finds that the defendant is amenable to sex offender treatment.

☐ The court finds that the defendant is willing to participate in sex offender treatment.

License Suspension

☐ CDS / Paraphernalia (N.J.S.A. 2C:35-16) ☐ Waived

☐ Auto Theft / Unlawful Taking (N.J.S.A. 2C:20-2.1)

☐ Eluding (N.J.S.A. 2C:29-2)

☐ Other _____

Number of Months

☐ Non-resident driving privileges revoked

Start Date

End Date

Details

Driver's License Number

Jurisdiction

If the court is unable to collect the license, complete the following:
Defendant's Address

City

State

Zip

Date of Birth

Sex

☐ M ☐ F

Eye Color


Details

Time Credits

Time Spent in Custody	Gap Time Spent in Custody	Prior Service Credit
R. 3:21-8	N.J.S.A. 2C:44-5b(2)	
Date: From - To	Date: From - To	Date: From - To
06/15/2011 - 06/30/2011	-	-
-	-	-
-	-	-
-	-	-
-	Total Number of Days _____	-
-	Rosado Time	-
-	Date: From - To	-
-	-	-
-	-	-
-	-	-
-	Total Number of Days _____	-
Total Number of Days 16		Total Number of Days _____

Statement of Reasons - Include all applicable aggravating and mitigating factors

This was a negotiated plea between the Prosecutor and defendant. There is therefore a presumption of reasonableness. It appears appropriate under all the facts and circumstances and, in the interest of justice, the Court will impose the recommended sentence. Defendant is 22 years old. Defendant has pled guilty to Count 1, amended to theft from the person, a third degree offense. The current offense appears to be the defendants fourth criminal arrest. She has no prior convictions. There is an active DP, a prostitution charge, stemming from a 3-11-11 arrest in Atlantic City. The charge was transferred to Superior Court. Aggravating Factor 9 applies. Mitigating Factors 6 applies if restitution is paid, and 7, 8, 9 and 10 apply. The Aggravating Factors and Mitigating Factors are in equipoise.

Form Prepared By DEBORAH HUNTER	Preparer Telephone Number (609) 909-8205
Attorney for Defendant at Sentencing ANTHONY W PREVITI	Public Defender <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Prosecutor at Sentencing BRENT HOPKINS	Deputy Attorney General <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Judge at Sentencing MICHAEL A. LONGO	
Judge (Signature) 	Date 1/11/12